

Exhibit 13

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VLSI TECHNOLOGY LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 18-cv-966-CFC
)	
INTEL CORPORATION,)	
)	
Defendant.)	
)	

**PLAINTIFF'S DISCLOSURE PURSUANT TO PARAGRAPH 4(a)
OF THE DELAWARE DEFAULT STANDARD FOR DISCOVERY**

Pursuant to the October 31, 2018 Scheduling Order (D.I. 40) and the Delaware Default Standard for Discovery, Plaintiff VLSI Technology LLC ("VLSI") provides the following disclosure.

I. Background

This disclosure is based on the information that VLSI has been able to obtain to date. Discovery in this matter has only recently commenced. The structure and operation of Intel's products and methods is in significant part proprietary, has not been adequately disclosed by Intel to this point, and is expected to be the subject of future discovery. For example, Intel has not yet produced a single document or interrogatory response to VLSI in this action. VLSI expects that information revealed in future discovery may result in identification of additional accused products.

II. Preliminary List Of Accused Products

Based on information currently available, VLSI preliminarily identifies the following accused products for each asserted patent that the products infringe. Where products are identified by architectural family (such as Haswell or Skylake, for example), all products in

that family are included to the extent consistent with the identification, including “server” and “client” variants of that architectural family. The accused products further include the chips in the products identified herein, the wafers from which such chips originate, other products (such as multi-chip packages (“MCPs”)) that contain those chips, and products (including subsequently released products) that are architected in or operate in materially the same pertinent manner as those described herein. “Intel Products” as used below means all products made, used, offered for sale, or sold by Intel within the United States, imported by Intel into the United States, or supplied or caused to be supplied (in whole or in part) in or from the United States by Intel, on or after June 28, 2012.

A. U.S. Patent No. 6,212,633

The Intel C620 Series Chipset Family, the Intel 300 Series Chipset Family On-Package Platform Controller Hub, and the Intel 100 Series Chipset Family, as well as Intel Products containing the Intel On-Chip System Fabric or otherwise having materially the same architecture or operation with respect to use of the claims.

B. U.S. Patent No. 7,246,027

The Intel Ivy Bridge, Haswell, Broadwell, Skylake, Kaby Lake, Coffee Lake, and Cannon Lake families of processors, as well as Intel Products designed to compensate for Inverse Temperature Dependence using thermal sensors in the manner described in Paragraphs 48-53 of the Complaint or otherwise having materially the same architecture or operation with respect to use of the claims.

C. U.S. Patent No. 7,247,552

The Intel Haswell family of processors, as well as Intel Products fabricated using reinforcing metal lines running in bond pad regions in the manner described in Paragraphs

70-83 of the Complaint or otherwise having materially the same architecture or operation with respect to use of the claims.

D. U.S. Patent No. 7,523,331

Intel Products that support Intel's vPro technology, as well as Intel Products that use an on-chip cache memory to store and execute instructions while a main memory is powered off in the manner described in Paragraphs 99-112 of the Complaint or otherwise having materially the same architecture or operation with respect to use of the claims.

E. U.S. Patent No. 8,081,026

The Intel Skylake, Kaby Lake, Coffee Lake, and Cannon Lake families of processors, as well as Intel Products with multi-mode power gating switches in the manner described in Paragraphs 130-141 of the Complaint or otherwise having materially the same architecture or operation with respect to use of the claims.

VLSI reserves its right to amend this disclosure.

Dated: November 12, 2018

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

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CERTIFICATE OF SERVICE

I, Brian E. Farnan, hereby certify that on November 12, 2018, a copy of Plaintiff's Disclosure Pursuant to Paragraph 4(a) of the Delaware Default Standard for Discovery was served on the following as indicated:

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